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12 Attorneys for Defendant
13 ROWLAND MARCUS ANDRADE

14 IN THE UNITED STATES DISTRICT COURT
15 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17
18 THE UNITED STATES OF AMERICA,)
Plaintiff,)
19 vs.)
20 ROWLAND MARCUS ANDRADE,)
Defendant.)
21)
22)
23)
24)
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28)

**DECLARATION OF KERRIE C. DENT IN
SUPPORT OF ANDRADE'S MOTION FOR
RECONSIDERATION OF MOTION FOR
AN EVIDENTIARY HEARING TO
ADDRESS GOVERNMENT MISCONDUCT
AND TO SEEK SANCTIONS, INCLUDING
POTENTIAL DISMISSAL OF THE
INDICTMENT**

No. 3:20-cr-00249-RS
Judge: Hon. Richard Seeborg

1 Kerrie C. Dent, counsel for Defendant Marcus Andrade, states as follows:

2 1. I am one of the lawyers representing Defendant Marcus Andrade in the above-
3 captioned matter. I file this declaration in support of Mr. Andrade's Motion for Reconsideration
4 of the Court's Denial of His Motion for an Evidentiary Hearing to Address Government
5 Misconduct and to Seek Sanctions, Including Potential Dismissal of the Indictment.

6 2. I have personal knowledge of the evidence in this case. In addition, over the past
7 several months, I have spoken and emailed with our proffered witnesses and/or individuals with
8 direct knowledge of their personal situations and the information they are willing to share on the
9 witness stand. If called as a witness in this matter, I could competently testify about these
10 matters.

11 3. I am filing a motion for reconsideration of the Court's February 5, 2025 denial of
12 Mr. Andrade's motion for an evidentiary hearing and to address the government's misconduct
13 based on new evidence that I learned of yesterday. Specifically, I learned yesterday, in a phone
14 call, that Agent Buma would be willing to provide more detailed evidence than he had
15 previously indicated.

16 4. One of my confidential sources, who speaks directly with Agent Buma on a
17 regular basis, informed me yesterday that Agent Buma could testify that notes taken by Jack
18 Abramoff around May 31, 2018, while in a meeting with Ukrainian businessman Alexander
19 Levin and Ukrainian billionaire Igor Kolomoisky, relate to two right-wing political campaigns
20 Abramoff was running. Abramoff's two campaigns were the "Anti-Corruption" campaign
21 (aimed at tying Joe Biden, Trump's chief political rival at the time, to corruption in Ukraine);
22 and the "V/V" campaign (a pro-Russia, pro-Putin campaign). A key element to both campaigns
23 was the use of media to spread the desired narrative. I was told that Agent Buma also could
24 testify that his interpretation of Abramoff's notes is that the funding for these campaigns came,
25 in part, from the promotion and sale of AML Bitcoin. My confidential source told me that
26 Agent Buma has said that he would appear to provide testimony unless his employer, the FBI,
27 intervened to prevent him from doing so.

